

Remarks

Applicant respectfully requests reconsideration of the present application in light of the foregoing amendments and following remarks.

Claims 1-38, 47 and 53-55 remain pending. Claims 39-46 and 48-52 were previously cancelled. Claims 1, 16, 31, 47, 53, and 54 are independent.

Claims 1-38, 47 and 53-55 are rejected. These rejections are respectfully traversed.

Claims 1-38, 47, and 53-55 are Patentable over Burget and Szondy under 35 U.S.C. § 103

The Office Action ("Action") rejects claims 1-38, 47 and 53-55 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,557,005 to Burget ("Burget") in view of U.S. Pub. No. 2002/0078253 of Szondy ("Szondy"). Applicant respectfully traverses these rejections.

Claims 1-15

Independent claim 1 is directed to an apparatus for presenting content to a user, and recites the following features:

- a plurality of layout strings files;
- a plurality of layout information files to describe how a layout string is displayed for a unique combination of a language and a device; and
- a computer to store the layout strings files and the layout information files.

The Action asserts at page 3 that Burget discloses the recited plurality of layout strings files and directs attention to the language database 101 of Figure 1 and col. 5, lines 1-15 of Burget. However, the cited portion of Burget merely provides that "[t]he language database 101 contains counterpart text elements to the text elements in the question database 102 prepared in a variety of different languages." Thus, Burget describes a system in which *text elements* are stored in *one database* (the question database 102) and *counterpart text elements* are stored in a *separate database* (the language database 101). Consequently, Burget does not teach or suggest at least "a plurality of layout strings files," as recited in independent claim 1.

The Action also asserts at page 3 that Burget discloses the recited plurality of layout information files and directs attention to col. 4, lines 45-67 of Burget. However, the cited portion of Burget merely describes a template database 103 that "stores a template for each web form available to remote users through the web-site (100)" where "[e]ach template specifies the layout of the web form, for example, the data entry elements to be included on the web form,

their appearance and spatial relationship to each other.” In contrast, the recited layout information files may each specify a certain layout for a particular gadget, *see, e.g.*, Specification at page 6, lines 5-10. Therefore, Burget does not teach or suggest at least “a plurality of layout information files to describe how a layout string is displayed for a unique combination of a language and a device,” as recited in independent claim 1.

Furthermore, because Burget does not teach or suggest the recited plurality of layout strings files and the recited plurality of layout information files, Burget also fails to teach or suggest “a computer to store the layout strings files and the layout information files,” as recited in independent claim 1.

Szondy does not cure the deficiencies of Burget. For example, Szondy does not teach or suggest the recited plurality of layout strings files. Szondy also fails to teach or suggest the recited plurality of layout information files, let alone the recited computer to store the layout strings files and the layout information files.

Because Burget and Szondy do not teach or suggest each and every element recited in independent claim 1, the 35 U.S.C. § 103(a) rejection of the claim should be withdrawn and such action is respectfully requested.

Dependent claims 2-15 depend from independent claim 1 and are allowable for at least the reasons presented above with respect to the parent claim 1. Accordingly, the 35 U.S.C. § 103(a) rejections of dependent claims 2-15 should be withdrawn and such action is respectfully requested.

Dependent claims 2-15 are also independently patentable. For example, Burget does not teach or suggest at least “wherein each of the layout strings files stores the layout string in a language” and “wherein each layout strings file includes a layout string in one language,” as recited in dependent claims 2 and 8, respectively. Nothing in Burget teaches separate files such that each file stores a layout string in a language; rather, Burget simply discloses a language database 101 that contains counterpart text elements, as noted above.

Furthermore, Burget does not teach or suggest at least “a resource file map to store at least two combinations of a layout information file and languages in which the layout strings files store the layout strings,” as recited in dependent claim 3. The Action at page 4 directs attention to col. 5, lines 10-17 of Burget, but the cited portion merely provides that “the server (104) will assemble a web form with the appropriate data entry devices in the appropriate

language as arranged according to the appropriate template (FIG. 2; 205).” There is no mention of anything that could possibly be construed as the recited resource file map.

In addition, Burget does not teach or suggest “a ranked list of languages,” let alone “a selector to select one of the plurality of layout information files and one layout strings file based on the ranked list of languages and the resource file map” and “means for selecting one of the plurality of layout information files and one layout strings file based on a ranked list of languages,” as recited in dependent claims 3 and 12, respectively. The Action asserts at page 4 that Burget discloses the recited ranked list of languages and directs attention to Figure 1 of Burget. However, neither the cited figure nor any other portion of Burget teaches anything pertaining to any type of *ranked list*, let alone a ranked list of languages or selecting one of a plurality of layout information files and one layout strings file based on the ranked list of languages.

Because Burget does not teach or suggest the recited resource file map, as discussed above, it follows that Burget does not teach or suggest at least “the resource file map stores combinations of layout information files, languages in which the layout strings files store the layout strings, and identities of devices for display of the information,” “the resource file map stores combinations of the layout information files, languages in which the layout strings files store the layout strings, and identities of devices for display of the information,” and “wherein the resource file map stores information about context-dependent data not stored in the layout information files or the layout strings files,” as recited in dependent claims 5-7, respectively.

Claims 16-30

Independent claim 16 is directed to a computer-implemented method for displaying content to a user, and recites the following features:

- locating a layout information file from a plurality of layout information files specifying how a layout string is to be presented to the user for a unique combination of a language and a device;
- locating one of a plurality of layout strings files storing the layout string; and
- presenting the layout string to the user according to the located layout information file.

As discussed above, Burget does not teach or suggest a plurality of layout strings files. Accordingly, Burget does not teach or suggest at least “locating one of a plurality of layout

strings files storing the layout string,” let alone “presenting the layout string to the user according to the located layout information file,” as recited in independent claim 16.

Because Burget and Szondy do not teach or suggest each and every element recited in independent claim 16, the 35 U.S.C. § 103(a) rejection of the claim should be withdrawn and such action is respectfully requested.

Dependent claims 17-30 depend from independent claim 16 and are allowable for at least the reasons presented above with respect to the parent claim 16. Accordingly, the 35 U.S.C. § 103(a) rejections of dependent claims 17-30 should be withdrawn and such action is respectfully requested.

Dependent claims 17-30 are also independently patentable. For example, Burget does not teach or suggest at least “the method further comprises obtaining the content from a content provider” and “presenting the layout string to the user includes presenting the content and the layout string to the user according to the located layout information file,” as recited in dependent claim 17. The Action at page 9 directs attention to various portions of Burget. However, nothing in Burget teaches or suggests anything pertaining to *obtaining content* from a *content provider*; rather, Burget focuses on “soliciting *data* from *remote users*” (emphasis added) and “a *data entry form* requested by a remote user,” *see* col. 1, line 57, to col. 2, line 11.

Burget does not teach or suggest a ranked list of languages, as discussed above. It follows that Burget does not teach or suggest at least “receiving a ranked list of languages from the user” and “identifying the selected language from the resource file map based on the ranked list of languages,” “identifying a highest-ranked language from the ranked list of languages such that one of the plurality of layout information files and the one of the plurality of layout strings files exist for the highest-ranked language,” “identifying the selected language includes identifying the selected language from the resource file map based on the ranked list of languages and the device,” “locating a default layout information file specifying how the content is to be presented to the user if the resource file map does not specify a combination including a particular layout information file and at least one of the device or one of the languages in the ranked list of languages,” and “locating a default layout information file specifying how the content is to be presented to the user if the resource file map does not specify a combination including a particular layout information file and one of the languages in the ranked list of languages,” as recited in dependent claims 20-24, respectively.

Furthermore, Burget does not teach or suggest a resource file map, as discussed above. Accordingly, Burget does not teach or suggest at least “accessing a resource file map listing recognized combinations of layout information files and languages in which the layout strings file store the layout string” and “identifying the selected language from the resource file map based on the ranked list of languages,” “accessing a resource file map includes accessing a resource file map listing all combinations of layout information files, languages, and devices” and “identifying the selected language includes identifying the selected language from the resource file map based on the ranked list of languages and the device,” “locating a default layout information file specifying how the content is to be presented to the user if the resource file map does not specify a combination including a particular layout information file and at least one of the device or one of the languages in the ranked list of languages,” “locating a default layout information file specifying how the content is to be presented to the user if the resource file map does not specify a combination including a particular layout information file and one of the languages in the ranked list of languages, and “accessing a resource file map includes accessing a resource file map storing information about other context-dependent data,” as recited in dependent claims 20 and 22-25, respectively.

Claims 31-38

Independent claim 31 is directed to one or more computer-readable media containing a program to display content to a user, and recites the following features:

- location software to locate a layout information file from a plurality of layout information files specifying how a layout string is to be presented to the user for a unique combination of a language and a device;

- location software to locate one of a plurality of layout strings files storing the layout string; and

- presentation software to present the layout string to the user according to the located layout information file.

As discussed above, Burget does not teach or suggest a plurality of layout strings files. Accordingly, Burget does not teach or suggest at least “location software to locate one of a plurality of layout strings files storing the layout string,” let alone “presentation software to present the layout string to the user according to the located layout information file,” as recited in independent claim 31.

Because Burget and Szondy do not teach or suggest each and every element recited in independent claim 31, the 35 U.S.C. § 103(a) rejection of the claim should be withdrawn and such action is respectfully requested.

Dependent claims 32-38 depend from independent claim 31 and are allowable for at least the reasons presented above with respect to the parent claim 31. Accordingly, the 35 U.S.C. § 103(a) rejections of dependent claims 32-38 should be withdrawn and such action is respectfully requested.

Dependent claims 32-38 are also independently patentable. For example, Burget does not teach or suggest obtaining *content* from a *content provider*, as discussed above. Accordingly, Burget does not teach or suggest at least “obtaining software to obtain the content from a content provider” and “presentation software to present the content and the layout string to the user according to the located layout information file,” as recited in dependent claim 32.

Also, Burget does not teach or suggest a ranked list of languages, as discussed above. It follows that Burget does not teach or suggest at least “reception software to receive a ranked list of languages from the user” and “identification software to identify the selected language from the resource file map based on the ranked list of languages,” “identification software to identify a highest-ranked language from the ranked list of languages such that one of the plurality of layout information files and the one of the plurality of layout strings files exist for the highest-ranked language,” and “location software to locate a default layout information file specifying how the content is to be presented to the user if the resource file map does not specify a combination including a particular layout information file and one of the languages in the ranked list of languages,” as recited in dependent claims 35-37, respectively.

Furthermore, Burget does not teach or suggest a resource file map, as discussed above. Accordingly, Burget does not teach or suggest at least “accessing software to access a resource file map listing recognized combinations of layout information files and languages in which the layout strings file store the layout string” and “identification software to identify the selected language from the resource file map based on the ranked list of languages,” and “location software to locate a default layout information file specifying how the content is to be presented to the user if the resource file map does not specify a combination including a particular layout information file and one of the languages in the ranked list of languages,” as recited in dependent claims 35 and 37, respectively.

Claim 47

Independent claim 47 is directed to a computer-implemented method for using a selected context to display content to a user, and recites the following features:

- locating a layout information file from a plurality of layout information files specifying how the content is to be presented to the user for a unique combination of a language and a device;

- locating a layout strings file storing a layout string in the selected context; and
- presenting the content and the layout string in the selected context to the user according to the located layout information file.

Independent claim 47 recites features that are substantially similar to the features recited in independent claim 31 and, therefore, should be allowed for at least the same reasons that pertain to independent claim 31. Accordingly, the 35 U.S.C. § 103(a) rejection of independent claim 47 should be withdrawn and such action is respectfully requested.

Claim 53

Independent claim 53 is directed to an apparatus for presenting content to a user, and recites the following features:

- a file storing a plurality of layout strings sub-files and a plurality of layout information sub-files to describe how content and a layout string are displayed for a unique combination of a language and a device;

- a resource file map to store at least two combinations of the layout information sub-file and languages in which the layout strings sub-files store the layout strings;

- a computer to store the file and the resource file map;

- a ranked list of languages; and

- a selector to select one of the plurality of layout information sub-files and one layout strings sub-file based on the ranked list of languages and the resource file map.

As discussed above, Burget does not teach or suggest a plurality of layout strings files. It follows that Burget does not teach or suggest at least “a file storing a plurality of layout strings sub-files and a plurality of layout information sub-files to describe how content and a layout string are displayed for a unique combination of a language and a device,” as recited in independent claim 53.

In addition, Burget does not teach or suggest a resource file map, as discussed above. Accordingly, Burget does not teach or suggest at least “a resource file map to store at least two combinations of the layout information sub-file and languages in which the layout strings sub-

files store the layout strings” and “a computer to store the file and the resource file map,” as recited in independent claim 53.

Furthermore, Burget does not teach or suggest a ranked list of languages, as discussed above. Accordingly, Burget does not teach or suggest at least “a ranked list of languages,” as recited in independent claim 53.

Because Burget does not teach or suggest a plurality of layout strings files, a resource file map, and a ranked list of languages, it follows that Burget does not teach or suggest “a selector to select one of the plurality of layout information sub-files and one layout strings sub-file based on the ranked list of languages and the resource file map.”

Because Burget and Szondy do not teach or suggest each and every element recited in independent claim 53, the 35 U.S.C. § 103(a) rejection of the claim should be withdrawn and such action is respectfully requested.

Claims 54 and 55

Independent claim 54 is directed to a gadget file structure, and recites the following features:

- a first directory storing at least two layout strings files, each layout strings file storing a layout string in a language;

- a second directory storing at least one layout information file for a first combination of a language and a device, the layout information file designed to be combined with one of the layout strings files and content to display the layout string and the content to a user in a selected language on the device;

- a third directory storing at least one layout information file for a second combination of a language and a second device, the layout information file designed to be combined with one of the layout strings files and the content to display the layout string and the content to the user in the selected language on the second device; and

- a resource file map identifying valid combinations of layout information files and languages in which the layout strings files store layout strings for the device.

Burget does not teach or suggest a plurality of layout strings files, as discussed above. Consequently, Burget does not teach or suggest at least “a first directory storing at least two layout strings files, each layout strings file storing a layout string in a language,” “a second directory storing at least one layout information file for a first combination of a language and a device, the layout information file designed to be combined with one of the layout strings files and content to display the layout string and the content to a user in a selected language on the

device,” and “a third directory storing at least one layout information file for a second combination of a language and a second device, the layout information file designed to be combined with one of the layout strings files and the content to display the layout string and the content to the user in the selected language on the second device,” as recited in independent claim 54.

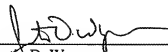
Furthermore, Burget does not teach or suggest a resource file map, as discussed above. Accordingly, and because Burget does not teach or suggest the recited layout strings files, Burget does not teach or suggest at least “a resource file map identifying valid combinations of layout information files and languages in which the layout strings files store layout strings for the device,” as recited in independent claim 54.

Because Burget and Szondy do not teach or suggest each and every element recited in independent claim 54, the 35 U.S.C. § 103(a) rejections of claim 54 and its dependent claim 55 should be withdrawn and such action is respectfully requested.

Conclusion

Applicant submits that the present application is in condition for allowance and such action is respectfully requested.

Respectfully submitted,



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